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CLARK HILL PLLC CRANE M. POMERANTZ

Nevada Bar No. 14103 Email: cpomerantz@clarkhill.com 3 3800 Howard Hughes Parkway, Suite 500 Las Vegas, Nevada 89169 4 Telephone: (702) 826-8300 Facsimile: (702) 862-8400 5 Attorney for Defendant Telusma 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 UNITED STATES OF AMERICA, CASE NO. 2:17-cr-00306-JCM-PAL-16 9 Plaintiff, 10 VS. MOTION TO AUTHORIZE FUNDS 11 FOR TRAVEL JOHN TELUSMA, 12 Defendant. 13 14 Defendant, John Telusma, by and through undersigned counsel, respectfully submits the 15 Motion to Authorize Funds for Travel for the upcoming sentencing hearing on May 25, 2022. In 16 support thereof, Mr. Telusma states as follows: 17 1. On October 13, 2021, the defendant appeared before the Court and pleaded guilty 18 to Count One of the Second Superseding Criminal Indictment. Count One charged Racketeering 19 Conspiracy, in violation of 18 U.S.C. § 1962(d). 20 2. Mr. Telusma's sentencing hearing is scheduled for May 25, 2022. 21 3. Mr. Telusma resides in Brooklyn, New York. He is not in custody. 22 4. Mr. Telusma has been found indigent for purposes of representation. Mr. Telusma 23 has limited resources and does not have a regular source of income. As such, he does not have 24 sufficient funds to pay for his travel to the District of Nevada for his sentencing hearing. 25 5. Undersigned counsel just learned that Mr. Telusma is exploring taking a loan in 26 order to defray the cost of traveling to Las Vegas for sentencing. According to Mr. Telusma's Pre-27 Sentence Investigation Report, he has a negative net worth. See PSR at № 125. 20

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1	6. Pursuant to 18 U.S.C. § 4285, the Court may "direct the United States marshal to
2	arrange for [a defendant's] means of noncustodial transportation or furnish the fare for such
3	transportation to the place where his appearance is required." 18 U.S.C. § 4285. In addition, the
4	Court may "direct the United States marshal to furnish that person with an amount of money for
5	subsistence expenses to his destination." <i>Id</i> .
6	7. Mr. Telusma respectfully requests that the Court issue an Order directing the United
7	States Marshal Service to pay for the cost of non-custodial transportation to be present in the
8	District of Nevada on May 25, 2022, and to furnish Mr. Telusma with subsistence expenses,
9	including reimbursement for lodging, meals, travel to and from the airport and to and from the
10	courthouse.
11	Dated this 10 th day of May, 2022.
12	Respectfully submitted,
13	CLARK HILL PLLC
14	/s/ Crane Pomerantz
15	Crane M. Pomerantz
16	Nevada Bar No.: 14103 3800 Howard Hughes Parkway, Suite 500
17	Las Vegas, Nevada 89169 Tel: (702) 862-8300
18	Fax: (702) 862-8400
19	Attorney for Defendant Telusma
20	<u>ORDER</u>
21	IT IS ORDERED that the United States Marshal's Service is directed to arrange and pay
22	for Mr. Telusma's non-custodial transportation to and from the District of Nevada for his May 25,
23	2022 sentencing, and reimbursement of subsistence expenses.
24	DATED May 20, 2022.
25	Honorable James C. Mahan
26	United States District Judge
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CERTIFICATE OF SERVICE The undersigned, an employee of Clark Hill PLLC, hereby certifies that on the 10th day of May, 2022, I served a copy of the Motion to Authorize Funds for Travel by electronic service to all interested parties, through the Court's electronic service (ECF) system addressed to: Chad William McHenry chad.w.mchenry@usdoj.gov, caseview.ecf@usdoj.gov, debra.vainio@usdoj.gov, kelly.pearson@usdoj.gov, mayumi.coffman@usdoj.gov Kelly K. Pearson kelly.pearson@usdoj.gov Alexander Byrne Gottfried alexander.gottfried@usdoj.gov /s/ Judy Estrada An employee of Clark Hill PLC